

Meeting Notes – Treated Seed Petition Discussion with OGC (3/9/21)

3:15 PM to 4:00 PM; Microsoft Teams Meeting # 571-429-6099

Conference ID: 354 320 454#

Attendees:

EPA:

- PRD RMIB IV: Quinn Gavin, Sue Bartow, Maryam Muhammad, Julie Javier, and Linda Arrington (BC)
- OGC: Angela Huskey, Michele Knorr, and Erin Koch

Objective: To discuss the path forward for the treated seed petition and how it will affect the neonic decisions.

Discussion: Upon reviewing the treated seed petition OGC **Attorney Client / Ex. 5**

Attorney Client / Ex. 5

Background:

- Previously, EPA and PMRA issued a joint statement on treated seeds. It states that if the pesticide is protecting the seed, then the treated article exemption applies. Until now it has

Deliberative Process / Ex. 5

Issues associated with the seed petition

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

- ## Deliberative Process / Ex. 5

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- OPP and NRDC had a conference call on 3/5/21. NRDC mentioned treated seeds and had three key points. These points could be vulnerabilities in the neonic IDs if they were mentioned in the public comments.

- ## Deliberative Process / Ex. 5

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exemption.

- OGC quickly stated

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Deliberative Process / Ex. 5

- Industry has made the argument that there are three parts to a seed. In their argument, they claim that one part of the seed is the 'baby' plant so any residues in the plant is really an extension of the seed.

- OGC believes

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Additional Information to Consider

- ## Attorney Client / Ex. 5

Attorney Client / Ex. 5

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Next steps:

- **Deliberative Process / Ex. 5**
- **Deliberative Process / Ex. 5**
- Develop a policy paper with the issues and possible options for moving forward.
 - **Deliberative Process / Ex. 5**